No. 86-656 (2)

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IN THE

Supreme Court of the United States

OCTOBER TERM, 1986

RONALD W. REAGAN, *et al.*, *Petitioners*,

—v.—

JAMES ABOUREZK, *et al.*, *Respondents*.

GEORGE P. SHULTZ, *et al.*, *Petitioners*,

—v.—

CITY OF NEW YORK, *et al.*, *Respondents*.

GEORGE P. SHULTZ, *et al.*, *Petitioners*,

—v.—

BRUCE CRONIN, *et al.*, *Respondents*.

ON PETITION FOR A WRIT OF *CERTIORARI* TO THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

RESPONDENTS' BRIEF IN OPPOSITION

STEVEN R. SHAPIRO
(*Counsel of Record*)
ARTHUR EISENBERG
New York Civil Liberties Union
132 West 43 Street
New York, New York 10036
(212) 382-0557

FREDERICK A.O. SCHWARZ, JR.
Corporation Counsel of the
City of New York
100 Church Street
New York, New York 10007
(212) 566-3801
By: Michael D. Young
Ass't Corp. Counsel

LEONARD B. BOUDIN
EDWARD COPELAND
National Emergency Civil
Liberties Committee
Rabinowitz Boudin Standard
Krinsky & Lieberman
740 Broadway
New York, New York 10003-9518
(212) 254-1111

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Respondents submit this brief in opposition to the petition for certiorari filed by the Solicitor General, which seeks review of the judgment entered in this action by the United States Court of Appeals for the District of Columbia on March 11, 1986.

STATEMENT OF THE CASE

These three consolidated cases were filed in December 1983, alleging that on four separate occasions the government improperly denied nonimmigrant visas to foreign speakers under §212(a)(27) of the Immigration and Nationality Act, 8 U.S.C. §1182(a)(27). Respondents contend that these visa denials are inconsistent with the plain language of the statute, which applies only when there is reason to believe that a foreign visitor will engage in "activities ... prejudicial to the public interest" if admitted to the United States. Alternatively, respondents contend

that the statute is unconstitutional if construed to permit visa denials based on a speaker's political views or the anticipated reaction of the speaker's American audience.[1]

Neither issue has yet been resolved. The Court of Appeals expressly reserved decision on respondents' constitutional claim. (App. at 30a, n.24).[2] Respondents' statutory claim, which had been rejected by the district court, was remanded by the Circuit "for the fuller proceedings appropriate prior to resolution of this question ..." (App. at

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1. The numerous respondents in this action are all American citizens or American-based organizations. Their standing to challenge a visa denial under these circumstances was settled by Kleindienst v. Mandel, 408 U.S. 753 (1972). As this Court noted in Mandel: "It is now well established that the Constitution protects the right to receive information and ideas." Id. at 762 (citations omitted).

2. Unless otherwise noted, all references are to the appendix to the petition for certiorari.

22a). In short, the legal issues presented by this case are still evolving. Precisely because those issues are important, they should not be resolved on the incomplete record that currently exists.

The opinion below fairly recites the relevant facts and procedural history. (App. at 5a-6a). Certain items, however, are worthy of emphasis. First, the government has never alleged a basis for believing that any of the excluded foreigners intends or is likely to engage in prejudicial "activities" if permitted to accept the speaking invitations proffered by respondents in the United States. Instead, petitioners have argued that §212(a)(27) authorizes a visa denial whenever there is reason to believe that a foreigner's "entry" or "presence" in the United States would, in the government's view, be prejudicial to the public interest.

Second, petitioners' own affidavits

strongly suggest that these visa denials were motivated by a desire to censor political speech. Accordingly, petitioners' emphasis on "entry" and "presence" as operative terms under §212(a)(27) is of questionable relevance to these proceedings and hardly a basis for certiorari on the present record.

The government initially attempted to justify its visa denials in this case by submitting a conclusory affidavit from the State Department that merely repeated the statutory language of §212(a)(27). When that explanation was deemed inadequate by the district court (App. at 76a), the government submitted classified affidavits for the court's ex parte review. (App. at 86a-94a). Those affidavits have since been declassified. Their contents help to illuminate the actual issues raised by this case.

For example, in Cronin v. Shultz, the

affidavit of Lawrence S. Eagleburger, then Under Secretary of State for Political Affairs, reveals that in 1982 a decision was made to bar all members of the World Peace Council (WPC) from the United States because of a generalized concern that the WPC was being used by the Soviet Union to further its "propaganda" and "disinformation" campaign in favor of unilateral western disarmament. (App. at 92a-94a). Pursuant to this policy, Nino Pasti, a former Italian NATO general, was prohibited from addressing a disarmament rally in Boston. Whatever the merits of that decision, it clearly reflects a preoccupation with Pasti's proposed speech in this country, rather that his mere "entry" or "presence."

Similarly, Mr. Eagleburger's affidavit in Abourezk v. Reagan seems less concerned with abstract issues of "entry" or "presence" than with inhibiting the ability of the American people to hear the political views

of Nicaragua's Interior Minister. Thus, the Eagleburger affidavit explains that Tomas Borge was denied a visa, at least in part, because several months earlier another Nicaraguan official had visited this country and "publicly advanc[ed]" a series of proposals that were allegedly inconsistent with the Administration's foreign policy goals. (App. at 87-88a).

Third, there is every reason to believe that the further inquiry into congressional acquiescence directed by the Court of Appeals will be both feasible and useful. The government argues that, like Haig v. Agee, 453 U.S. 280, 303 (1981), its claim of congressional acquiescence should not be defeated by the paucity of examples in which §212(a)(27) was even arguably invoked based on mere "entry" or "presence." But unlike Haig v. Agee, the government's statistics in this case indicate that §212(a)(27) has been invoked a total of

519 times between 1963 and 1983. Pet. for Cert. at 6 n.2. Surely it is not inappropriate to ask whether the government can offer more than the three examples it has so far provided to support its claim of congressional acquiescence. (App. at 20a). That question, however, cannot be answered without further proceedings in the district court.

Fourth, the government's contention that the decision below inappropriately limits its foreign policy flexibility is diminished by the government's inability to explain why it did not use §212(a)(28). Absent a credible explanation, the Court of Appeals was properly concerned that §212(a)(27) was principally chosen to circumvent the congressional limitations on §212(a)(28)

embodied in the McGovern Amendment.[3] (App. at 22a-24a). Indeed, the consular officer who initially reviewed Nino Pasti's visa application identified it as a §212(a)(28) case. (App. at 5a). Section 212(a)(27) was not invoked until Pasti's visa application was transmitted to Washington.

Fifth, the spectre of unregulated discovery raised by the government if this petition is denied is premature and unwarranted. The government has raised, and can continue to raise, discovery disputes with the district court as circumstances

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3. Under the McGovern Amendment, 22 U.S.C. §2691 (1977), the Secretary of State must certify to both houses of Congress that national security is at stake before he can recommend exclusion from the United States based on membership in a proscribed organization. No such certification was made in this case.

dictate.[4]

Finally, and perhaps most importantly, no injunction has been issued in this case and no final judgment has yet been rendered. The government has not been required by judicial order to admit any excluded foreign speaker, either in this case or any other case of which respondents are aware. Nor has the government been forced to abandon reliance on §212(a)(27). To the contrary, the government has persisted in its interpretation and use of §212(a)(27) throughout the pendency of this litigation.

In its present posture, therefore, this case presents a still unresolved issue of statutory construction on an admittedly controversial and important subject. Plenary consideration by this Court may well be

4. Clearly, this Court is not the proper forum to litigate discovery disputes in the first instance.

appropriate someday. It is not appropriate now, for the reasons described below.

REASONS FOR DENYING THE WRIT

I. THE JUDGMENT BELOW IS CLEARLY NON-FINAL AND CONTEMPLATES FURTHER PROCEEDINGS ON THE PRECISE ISSUE NOW RAISED IN THIS COURT

In his dissent below, Judge Bork describes the judgment of the Court of Appeals in the following terms: "The majority's opinion is a cautious one: major issues presented in this litigation are left for subsequent resolution." (App. at 64a). For precisely that reason, the petition for certiorari should be denied. There will be ample time for this Court to consider the propriety of review once the record is complete and the difficult legal issues raised by this case have been fully considered by the lower courts.

The premature nature of this petition is illustrated by the government's first "question presented." Specifically, the government asks this Court to decide "whether 8 U.S.C. §1182(a)(27) permits denial of a

visa to an alien only if his activities - and not just his presence or entry - would be prejudicial to the public interest." While that is undoubtedly an interesting question, it mischaracterizes the actual holding by the Court of Appeals. The Court of Appeals carefully remanded this matter to the district court to determine whether the government could sustain its claim that Congress had acquiesced in an interpretation of §212(a)(27) that permits visa denials based on mere "entry" or "presence."

The government cannot have it both ways. If additional relevant evidence exists of congressional acquiescence, then this case is not yet ripe for review. If the government wants the case reviewed now, it should be prepared to stipulate that no such evidence of congressional acquiescence exists.

Even under these latter circumstances, however, there are compelling reasons why

respondents should be given the opportunity to continue discovery before certiorari is granted. Thus far, the government has offered three examples of past visa denials under §212(a)(27) that were allegedly based on mere "entry" or "presence." None conclusively establishes the congressional acquiescence that petitioners assert.

One of those examples involves Thomas Liao, a Formosan political leader who was barred from the United States under §212(a)(27) in 1959, 1961 and 1962, apparently because of a perceived "incompatibility between Mr. Liao's projected activities while in the United States and our foreign policy objectives with respect to Taiwan and the Republic of China." (App. at 20a).

Of course, to the extent that Mr. Liao was excluded because of his projected activities, his example does nothing to prove

that Congress has acquiesced in the use of §212(a)(27) to bar foreign speakers merely because their "entry" or "presence" was deemed prejudicial to the public interest. Furthermore, the discovery so far produced by the government indicates that the then chairman of the Senate Foreign Relations Committee, J. William Fulbright, strenuously objected to Mr. Liao's exclusion. It is certainly conceivable that further discovery will reveal additional problems with the examples proffered by the government.[5]

In any event, the important legal issues raised by this case should not be decided

5. As a second example, the government cites Otto Skorzeny, a former, high-ranking, Nazi SS officer who was excluded from the United States in 1959. C.A. App. A306. Former nazis, however, present a sui generis problem under the immigration laws. See 8 U.S.C. §1182(a)(33). The exclusion of Skorzeny, therefore, does not reveal very much about general congressional attitutes toward §212(a)(27).

based solely upon the government's self-interested selections from the historical record. Several months ago, the government provided respondents with a list of 175 documents "withheld from production" pending a declassification review. Many of the documents on that list appear directly relevant to the question of past administrative practice under §212(a)(27). For example, the first 20 documents on the list appear to include at least 7 memoranda discussing the appropriate interpretation of §212(a)(27).[7] These documents should be available to respondents and this Court prior to a final adjudication on the merits.

The government attempts to justify this departure from orderly procedure by arguing that the remand directed by the Court of Appeals will intrude into the government's

7. Five of the first six documents on the list refer to the case of Thomas Liao.

conduct of its foreign affairs. Pet. for Cert. at 25. As the government itself acknowledges, however, the scope of the remand is narrowly limited. Id. The question of whether or not the specific visa denials issued in this case were based on reasons independent of the applicants' membership in §212(a)(28) organizations simply requires a reexamination of the government's now declassified affidavits. The inquiry into congressional acquiescence only asks the government to complete the process that it voluntarily chose to begin; namely, the identification of any other historical examples in which Congress allegedly endorsed the use of §212(a)(27) based on mere "entry" or "presence."

Similarly, an examination into past administrative practice is clearly relevant in light of the government's claim that past administrative practice supports petitioners'

present interpretation of the statute. Again, available documents do not, on their face, seem to support that contention. For example, a 1982 opinion letter by the Office of Intelligence Policy and Review of the Department of Justice concludes that "[t]he law as framed seems to permit findings of ineligibility under [§212(a)(27)] only as to persons whom we have reason to believe intend to engage in proscribed activities" and that "the mere fact that a businessman or scientist might be exposed to controlled technology while in the United States, standing alone, is not enough to trigger section 212(a)(27)."[8]

Finally, the district court is fully capable, should the need arise, of balancing national security requirements against legitimate discovery needs. Indeed, the

8. See C.A. App. A189.

government has already invoked the state secrets privilege with regard to the deleted portions of Mr. Eagleburger's affidavit in Cronin v. Shultz.[8] At this stage of the proceedings, there is no reason to assume that the district court will be insensitive to the government's legitimate national security needs.

This Court has frequently noted that certiorari will not normally be granted to review an interlocutory order. E.g. Brotherhood of Locomotive Firemen and Enginemen v. Bangor & Aroostook R. R. Co., 389 U.S. 327 (1967)("because the Court of Appeals remanded this case, it is not yet ripe for review by this Court"). As Justice Jackson explained in an analogous context:

> While we might be able, on the

8. Once the petition for certiorari was filed, the district court stayed all discovery without ever ruling on the propriety of the privilege in this instance.

> present record, to reach a conclusion that would decide the case, it might well be found later to be lacking in the thoroughness that should precede judgment of this importance and which it is the purpose of the judicial process to provide.

Kennedy v. Silas Mason Co., 334 U.S. 249, 257 (1948). Cf. Los Angeles v. Preferred Communications, ___ U.S. ___, 90 L.Ed.2d 480, 488 (1986).

That sound rule of judicial administration should be followed here.

II. THE DECISION BELOW IS CORRECT

Because petitioners challenged so many aspects of the complaint below, it is worth emphasizing the limited nature of their present appeal. Petitioners in this Court do not challenge jurisdiction or standing, they do not claim that the case is moot, nor do they rely on the political question doctrine

to defeat judicial review.

Rather, petitioners contend that the court below erred in holding that the reference to prejudicial "activities" in §212(a)(27) requires some reference to actual activities in the United States before it can be invoked. Additionally, the government argues that membership in a proscribed organization is a ground for exclusion under both §212(a)(27) and §212(a)(28) and that the government is therefore free, in its unlimited discretion, to ignore the strictures of the McGovern Amendment simply by relying on the former subsection rather than the latter. In the absence of any persuasive evidence of congressional acquiescence in the government's strained interpretation of the statutory language, both arguments were properly rejected by the court below.

The government attempts to buttress its

statutory claims by stressing that this case involves foreign policy and immigration, two areas in which the courts have traditionally deferred to the political branches. Whatever validity that tradition may have in other contexts, it does not apply here where the question is whether the executive has followed the express will of Congress. When the executive oversteps its congressional authorization, even in areas of national security, this Court has never hesitated to correct the balance. See Youngstown Sheet & Tube Co. v. Sawyer, 343 U.S. 579 (1952). Cf. Japan Whaling Association v. American Cetacean Society, 54 U.S.L.W. 4929, 4931

(June 24, 1986).[9]

The Court of Appeals applied the traditional tools of statutory construction to the record before it, see Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984), in determining that the executive in this case exceeded the bounds of congressional intent. That conclusion is fully consistent with this Court's relevant precedents.

A. Plain Language of the Statute

This Court has often emphasized that "[t]he starting point for interpreting a statute is the language of the statute

9. In a further effort to flavor this case with foreign policy implications, the government has consistently referred to the problems created for the United States by the mere "presence" in this country of the Shah of Iran. The Shah's "presence" in this country, however, could have been avoided by a presidential proclamation under §212(f), 8 U.S.C. §1182(f), without distorting the meaning and reach of §212(a)(27). (App. at 7a, n.2).

itself." Consumer Product Safety Comm. v. GTE Sylvania, 447 U.S. 102, 108 (1984). Here, of course, the language of §212(a)(27) refers to prejudicial "activities." Yet, the government has never even alleged that any of the excluded foreigners in this case is likely to engage in prejudicial "activities" if admitted to the United States.

Instead, the government argues that the phrase prejudicial "activities" embraces mere "presence" or "entry." The difficulty with this argument is that the exclusionary categories created by Congress in §212(a) clearly distinguish between exclusions based on status and exclusions based on conduct. Section 212(a)(27) fits into the latter category. As the court below noted: "Congress' undoubted ability to draft categories based only on status, when that is the legislature's intention, strengthens the inference that the words 'to engage in

activities' contained in subsection (27) were not put there inadvertently." (App. at 16a-17a).

This is especially true when §212(a)(27) is compared to §212(a)(28). Section 212(a)(28), unlike §212(a)(27), specifically refers to a visa applicant's status as a member of a communist-affiliated organization. Recognizing this distinction, Congress carefully limited the reach of §212(a)(28) by adopting the McGovern Amendment, which does not apply to §212(a)(27). Petitioners' expansive construction of §212(a)(27) inappropriately upsets this delicately balanced congressional scheme.

B. Legislative History

Section 212(a)(27) was taken almost verbatim from §22(1) of the Internal Security Act of 1950.[10] Upon introducing §22(1) of

10. 64 Stat. 987.

the Act, Senator McCarran explained: "What the bill will do ... is to permit the deportation of a Communist who comes here under diplomatic ... status and then uses that status as a screen behind which to carry on subversive activity." 96 Cong. Rec. 14174 (1950).[11] Nothing in the legislative history of §212(a)(27) suggests that Congress intended to broaden the definition of prejudicial "activities" in §212(a)(27) beyond the description offered by Senator McCarran only two years earlier. At best, the legislative history is "inconclusive," as the court below described. (App. at 18a).

The government makes much of the claim that Congress has allegedly acquiesced in the

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11. The 1950 Conference Committee Report also refers to exclusions based upon prejudicial "activities" in the United States, H.R. Rep. No. 3112, 81st Cong., 2d Sess. 54 (1950), as does the report of the Senate Judiciary Committee, S.Rep. No. 1515, 81st Cong., 2d Sess. 800 (1950).

executive's application of §212(a)(27) based on mere "presence" or "entry." In support of that claim, however, the government offers only three ambiguous examples, the most recent of which is more than twenty years old. These "scattered rulings ... not consistently of one pattern," Kent v. Dulles, 357 U.S. 116, 128 (1958), do not justify the government's plea to override the plain statutory language. The government was fortunate to be given a second opportunity to produce further evidence. It is hardly in a position to complain about that ruling to this Court.

C. The McGovern Amendment

This Court has frequently observed that "[s]ubsequent legislation declaring the intent of an earlier statute is entitled to great weight in statutory construction." Red Lion Broadcasting v. FCC, 395 U.S. 367, 380-81 (1969). Furthermore, this Court has

held that "all parts of a statute, if at all possible, are to be given effect." Weinberger v. Hynson, Westcott & Dunning, Inc., 412 U.S. 609, 633 (1973).

Petitioners pay lip service to this principle. However, at the same time, they endorse a version of §212(a)(27) that effectively negates the McGovern Amendment. As the court below perceived, if it were true that mere membership in a proscribed organization justified exclusion under §212(a)(27), then petitioners could always avoid the certification requirement of the McGovern Amendment simply by using §212(a)(27) instead of §212(a)(28). Without conclusive evidence supporting the government's view, it would be extraordinary to conclude that Congress intentionally engaged in such a meaningless exercise when it adopted the McGovern Amendment to achieve "greater United States compliance" with the Helsinki Accords. 22

U.S.C. §2691(a).

D. Administrative Construction

The government contends that past administrative practice has consistently supported its interpretation of §212(a)(27) and should be given due deference by the courts. The record suggests otherwise.

Most notably, petitioners fail even to mention two relevant opinions by the Board of Immigration Appeals. In Matter of McDonald and Brewster, 15 I. & N. 203 (BIA 1975), the Board observed that §212(a)(27) was "designed to exclude aliens who seek to enter solely, principally, or incidentally to engage in activities inimical to the internal security of the United States ... " Id. at 205 (emphasis added). Similarly, in Matter of Zamora, A105-50-431 (March 11, 1958), an unreported decision, the Board refused to exclude an alien pacifist under §212(a)(27) despite the alien's alleged disagreement with

United States foreign policy objectives.

In addition, the government neglects to mention the 1982 Justice Department memorandum which concludes that §212(a)(27) only applies to "person[s] whom we have reason to believe intend to engage in proscribed activities."[13] The government also ignores an affidavit in the record by Leonard Meeker.[14] Mr. Meeker states that during his 23 years with the State Department, including service as the Legal Adviser from 1965-1969, §212(a)(27) "was understood . . . to be the basis for denying visas to aliens whose anticipated activities in the United States would create dangers to this country of a gravity comparable to espionage or sabotage."[15]

13. See note 8, supra.

14. C.A. App. A250.

15. Id. at A251-52.

In short, the plain language of §212(a)(27) and the clear purpose of the McGovern Amendment strongly support the ruling below. The legislative history and evidence of past administrative practice "tug[] in more than one direction." (App. at 17a). Under these circumstances, the Court of Appeals was surely entitled to remand for further proceedings on the pivotal question of legislative intent. Given the absence of any final decree, that interlocutory order should not be disturbed.

CONCLUSION

For the reasons stated herein, the petition for certiorari should be denied.

Respectfully submitted,

Steven R. Shapiro
(Counsel of Record)
Arthur Eisenberg
New York Civil Liberties Union
132 West 43 Street
New York, NY 10036
(212) 382-0557

Frederick A.O. Schwarz, Jr.
Corporation Counsel of the City of New York
100 Church Street
New York, NY 10007
(212) 566-3801
By: Michael D. Young
Ass't Corp. Counsel

Leonard B. Boudin
Edward Copeland
National Emergency Civil Liberties Committee
Rabinowitz Boudin Standard Krinsky & Lieberman
740 Broadway
New York, NY 10003-9518
(212) 254-1111

Susan W. Shaffer
ACLU Foundation
122 Maryland Avenue, NE
Washington, DC 20002
(202) 544-5388

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